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March 14, 2016

The Honorable Jesse M. Furman  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *In re: General Motors LLC Ignition Switch Litigation*, 14-MD-2543  
*Barthelemy, et al. v. General Motors LLC*, 14-CV-5810 (JMF)**

Dear Judge Furman:

Pursuant to Order No. 97 (Docket No. 2396), counsel for General Motors LLC (“New GM” or “GM LLC”) and counsel for the *Barthelemy* plaintiffs jointly submit the chart attached hereto as Exhibit A regarding those exhibits and demonstratives that are the subject of unresolved objections that the parties intend to use during the course of trial as early as tomorrow with Mark Hood.

Consistent with the Court’s request at the March 14 hearing that the parties prioritize exhibit objections requiring the Court’s attention, the parties respectfully request that the Court address as a priority New GM’s objections to PX-0095, which relate to whether the exhibit was properly disclosed as reliance material in Mr. Hood’s report.

The parties would also like to note that the following exhibits and demonstratives have been disclosed, but are not the subject of unresolved objections<sup>1</sup>: PX-0004<sup>2</sup>; PX-0092; PX-0141; PX-0333; PX-0390; PX-0391; PD-0002-0001 through PD-0002-0023; and PD-0003.

The parties previously provided the Court copies of their exhibits on March 7, 2016. To the extent the Court would like additional copies of the exhibits that are subject to unresolved objections, the parties would be happy to provide them upon request.

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<sup>1</sup>Where New GM indicates it has no objection, it does so subject to and without waiving any objection previously made and ruled upon by the Court in either *Scheuer* or *Barthelemy*.

<sup>2</sup> Subject to the redactions agreed to by the parties.

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Respectfully submitted,

/s/ Richard C. Godfrey, P.C.  
/s/ Andrew B. Bloomer, P.C.

*Counsel for Defendant General Motors LLC*

cc: MDL Counsel of Record